

EXHIBIT A

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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| In re: | : | Chapter 11: |
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| Lehman Brothers Holdings Inc., <i>et al</i> | : | Case Nos. 08-13555 (JMP) |
| | : | |
| Debtors. | : | (Jointly Administered) |
| | : | |
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**PROPOSED ORDER GRANTING MOTION OF LEHMAN BROTHERS
FINANCE ASIA PTE. LTD. (IN CREDITORS' VOLUNTARY LIQUIDATION)
FOR ENTRY OF AN ORDER (I) THAT ITS DERIVATIVE AND
GUARANTEE QUESTIONNAIRES BE DEEMED TIMELY FILED PROOFS
OF CLAIM AND (II) PERMITTING A LATE CLAIM FILING PURSUANT TO
FEDERAL RULE OF BANKRUPTCY PROCEDURE 9006(b)(1)**

Upon consideration of the Motion of Lehman Brothers Finance Asia Pte. Ltd. (In Creditors' Voluntary Liquidation) ("LBFA") for Entry of an Order (I) that its Derivative and Guarantee Questionnaires be Deemed Timely Filed Proofs of Claim and (II) Permitting a Late Claim Filing Pursuant to Federal Rule of Bankruptcy Procedure 9006(b)(1) (the "Motion"),¹ and due notice thereof having been provided as set forth in the Amended Order Implementing Certain Notice and Case Management Procedures entered in these proceedings, dated February 13, 2009; and it appearing that no other or further notice of the Motion need be provided; and having considered the Motion and any objections thereto; it is hereby

ORDERED that the Motion is granted as set forth herein; and it is further

ORDERED that to the extent any objections to the Motion have not been withdrawn or otherwise resolved, they are hereby overruled; and it is further

ORDERED that the Derivative Questionnaires and Guarantee Questionnaires are deemed timely filed proofs of claim; and it is further

¹ Capitalized terms not defined herein have the meaning ascribed to them in the Motion.

ORDERED that LBFA shall be deemed to have timely filed the following claims:

- a. A claim against LBCC in an amount no less than \$155,152,037.60 based on the LBCC Derivative Questionnaire;
- b. A claim against LBHI in an amount no less than \$155,152,037.60 based on the LBCC Guarantee Questionnaire;
- c. A claim against LBCS in an amount no less than \$2,296,415.51 based on the LBCS Derivative Questionnaire;
- d. A claim against LBHI in an amount no less than \$329,171.36 based on the LBJ Guarantee Questionnaire;
- e. A claim against LBHI in an amount no less than \$89,999.24 based on the LBSA Guarantee Questionnaire;
- f. A claim against LBSF in an amount no less than \$4,852,448.83 based on the LBSF Derivative Questionnaire;
- g. A claim against LBHI in an amount no less than \$4,852,448.83 based on the LBSF Guarantee Questionnaire;
- h. A claim against LBHI in an amount no less than \$229,122.10 based on the LBT Guarantee Questionnaire; and it is further

ORDERED that the proof of claim filed by LBFA against LBHI relating to the \$9,818.51 LBHI Intercompany Claim shall be deemed timely filed; and it is further

ORDERED that the Debtors shall retain all of their rights to object to the aforementioned claims on any basis other than timeliness.

Dated:

UNITED STATES BANKRUPTCY JUDGE